

APPENDIX D

**COMMENTS ON THE DRAFT ENVIRONMENTAL
ASSESSMENT AND DOE RESPONSES**

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On May 14, 2003, DOE distributed the Draft EA to the distribution list shown in Appendix C for a 30-day comment period. During the comment period, the Draft EA and a request for comments were also posted on the Golden Field Office electronic reading room at <http://www.golden.doe.gov>. DOE received one comment: a letter dated June 19, 2003, from Mr. Doug Jones, Archeologist, Community Programs Bureau, State Historical Society of Iowa, which is a Division of the Iowa Department of Cultural Affairs. The following table summarizes the three items raised in Mr. Jones' letter and DOE's responses to them. A full copy of the letter follows the table.

Comment Summary	DOE Response
<p>#1. Section 3.7 (Cultural Resources)</p> <p>Using information found in <i>A Brief History of Wapello County, Iowa</i> (Quinn 2001) http://www.extension.iastate.edu/wapello/county/history.html resulted in some inaccurate statements which could be interpreted as controversial and insensitive regarding American Indians in Wapello County. The information in that source does not accurately portray the current state of knowledge of either the prehistory or history of Wapello County. Better sources of both archeological and historical information in Wapello County are available, for example, information from the archeological investigations conducted for the initial construction of the OGS. Instead of just footnoting that more information on Iowa's cultural resources are available on-line at the office of the State Archeologist's website, DOE should incorporate that information into the EA.</p>	<p>The challenged article (1) was written by the Past President of the Wapello County Historical Society; (2) was posted on the Wapello County/Iowa State University Extension Homepage; and (3) appeared to offer an historical synopsis that was appropriate for an EA. Both the author and the sponsor of the webpage appeared to be reliable sources. DOE included the discussion of Native American history in Wapello County specifically to include Native American cultural resource concerns.</p> <p>DOE recognizes that detailed archeological investigations of Iowa's history and pre-history, including the information presented in Appendix A of the 1977 Draft EIS for construction of the OGS, would provide additional depth, detail, and rigor. However, the level of detail that is requisite for a pre-construction EIS would be inappropriately excessive for a post-construction EA at the same site.</p> <p>DOE did review the homepage of the State Archaeologist's office http://www.uiowa.edu/~osa/archaeology.htm and agrees that it offers a wealth of detailed information on Iowa's cultural resources. This website is now specifically cited in the text of the EA rather than just being footnoted.</p> <p>To address the commenter's concerns regarding historic and prehistoric accuracy, especially in regard to Native American history, the last two paragraphs of 3.7 were deleted and the following language added as the lead to Section 3.7.</p>

	<p>“Detailed information regarding the history and prehistory of the State of Iowa and Iowa counties is available from several on-line and library sources. The homepage of the Office of the State Archeologist (http://www.uiowa.edu/~osa/archaeology/le.htm) includes links that describe salient features of the region’s history and prehistory (OSA 2002). Specific information about Wapello County is available from the University of Iowa/Wapello County extension services (http://www.extension.iastate.edu/wapello/) (University of Iowa 2003). The most detailed site-specific information regarding cultural resources in the immediate vicinity of the Proposed Action is found in the 1977 Draft EIS for construction of the OGS, Appendix A, Archeological Investigations in the Proposed Area of the Ottumwa Generating Station Chillicothe, Iowa (EPA 1977), which is incorporated into this EA by reference.”</p>
<p>#2. Section 4.1.7.1 Cultural Resources -OGS Site</p> <p>The comment requests a point of clarification regarding archeological site 13WP28.</p>	<p>Section 4.1.7.1. was revised as follows to include the requested clarification regarding 13WP28.</p> <p>“The proposed new construction at the OGS site would not impact any cultural or historic resources. The proposed new facilities would be constructed entirely on previously disturbed OGS land. The SHPO has indicated that an eligible archeological site, 13WP28, still remains on the facility property. However, this site was avoided by the construction of the original facility and the SHPO agreed with the proposed construction activities at that time (EPA 1977). Site 13WP28 is not located within the area of potential effects for the Proposed Action. No sites on or near the location of the Proposed Action, including the one site that was discovered after the SHPO cleared the site for construction, are considered by the SHPO as eligible for listing in the National Register of Historic Places.”</p>

<p>#3. Section 4.1.7.1 (sic) Cultural Resources - Rathbun Lake Watershed. (Refer to section 4.1.7.2)</p> <p>The comment requests that the following point of clarification be added :</p> <p>“The SHPO requests that federal agencies responsible for these future corollary activities should consider developing a Programmatic Agreement in consultation with the SHPO and other potential consulting parties to further explore these issues and help to streamline the future Section 106 process consultation on these projects.</p>	<p>The commenter previously raised this issue in his response to DOE’s scoping letter (reference Appendix B).</p> <p>DOE considers this issue to be within the domain of cumulative impacts and considers the issue of Programmatic Agreements regarding commercial, full-scale switchgrass operations to be within the purview of the Department of Agriculture. Consequently, in response to the scoping letter comment, DOE included the following language in Section 5.2 (Cumulative Effects – Rathbun Lake Watershed) of the Draft EA:</p> <p>“The SHPO’s comments and recommendations (see Appendix B) implicitly recognize the potential for cumulative impacts from commercial switchgrass agricultural operations when the Office recommends a programmatic agreement between SHPO and other agencies that would be involved with future switchgrass undertakings. DOE concurs in principle with the potential value of such an agreement but feels that it would be most appropriate for USDA and SHPO to be the signatories, because DOE has no plans to be involved in future commercial agricultural operations, whereas the CRP would be involved with such operations.”</p> <p>DOE believes that the above language in Section 5.2 addresses this comment.</p>
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A Division of the Iowa Department of Cultural Affairs

June 19, 2003

In reply refer to:
R&C#: 030290082

Joyce Beck, NEPA Documents Manager
U.S. Department of Energy
Golden Field Office
1617 Cole Blvd.
Golden, Colorado 80401

RE: DOE - WAPELLO COUNTY - NOTICE OF SCOPING- SWITCHGRASS CO-FIRE
TESTING AT OTTUMWA GENERATING STATION, CHILLICOTHE, IA - SECS. 25, 26,
27, 35, & 36, T73N-R15W - DRAFT ENVIRONMENTAL ASSESSMENT FOR COMMENT

Dear Ms. Beck,

We have received the Draft Environmental Assessment for the above-referenced project. Thank you for providing the Iowa State Historic Preservation Office (SHPO) with the opportunity to review this undertaking and document. We make the following comments and recommendations based on our examination of this material and in accordance with Section 106 of the National Historic Preservation Act of 1966 and its implementing regulations 36 CFR part 800 (revised, effective January 11, 2001).

We would like to comment on a number of items within this document that we believe should be further clarified or reconsidered.

3.7 Cultural Resources

We would like to express our sincere concerns about the utilization of information from *A Brief History of Wapello County, Iowa* (Quinn 2001) found at the following website: <http://www.extension.iastate.edu/wapello/county/history.html>. The information on this website does not accurately portray the current state of knowledge of either the prehistory or history of Wapello County. It does discuss some factual information. However, it also includes inaccurate statements, which can be interpreted as controversial and insensitive regarding American Indians in Wapello County, both prehistorically and historically. An example of this is "The Fox and Sac tribes, which were originally from the Great Lakes region, have given Wapello County most of its Native American heritage." (p.22) The Sac (Sauk) and Fox (Meskwaki) tribes lived in Wapello County during the late 1700s and early 1800s. These tribes did live in the Great Lakes Region prior to living in Wapello County; however, both of these tribes were originally from the Eastern Seaboard. How can two tribes which were historic immigrants to this area be credited as responsible for most of the Native American Heritage in this county when archaeological investigations have demonstrated that American Indian occupation of this area goes back 12,000 years before present and involves many different tribal groups? Moreover, the archaeological investigations conducted for the initial construction of this facility demonstrates that Native American Mound Builders were not the first inhabitants of Wapello County.

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Another example of the inaccuracy of this information can be found in the statement "Iowa was never a permanent home to any Native Americans after the Mound Builders, but the state's plentiful game attracted migrating hunting parties." (p.21) Permanence of a home or occupation is a relative matter. It can be defined based on a number of criteria including size of a settlement and length of duration of occupation to mention a few. Many tribes would take serious issue with this statement as the archaeological evidence and their own oral history and traditions suggests that occupations of the area were just as permanent as our current occupation of the area.

This information seems to be based on information contained in county histories published in the late 1800s or early 1900s. Within this context, this information would make sense. However, much better sources for both archaeological and historical information from Wapello County are available and current. We strongly encourage your agency to reconsider its utilization of this dated information. We strongly encourage your agency to utilize archaeological and historical sources which are more current and accurate regarding the American Indian occupation of Wapello County. For example, you could reference information from the past archaeological investigations conducted for the initial construction of the facility. Instead of just footnoting that more information on Iowa's cultural resources is available on-line at the Office of the State Archaeologist's website, we encourage you to incorporate information from the website into your discussion.

4.1.7.1 Cultural Resources-OGS Site

We have a point of clarification in addition to the information your presented in this section. According to our records, there is an eligible archaeological site still remaining on the facility property, 13WP28. However, this site was avoided by the construction of the original facility and we agreed with the proposed construction activities at that time. We understand that site 13WP28 is not located within the Area of Potential Effect for the currently proposed undertaking at the existing facility. Therefore, we would concur that site 13WP28 will not be affected by the proposed undertaking at the existing facility. We would be able to concur with a finding of **No Historic Properties Affected** for the proposed undertaking activities at the current facility.

4.1.7.1 Cultural Resources-Rathbun Lake Watershed

We have a point of clarification to add to this section. We would like you to incorporate the following sentence to the end of this paragraph:

The SHPO recommends that federal agencies responsible for these future corollary activities should consider developing a Programmatic Agreement in consultation with the SHPO and other potential consulting parties to further explore these issues and to help streamline the future Section 106 process consultation on these projects.

As stated above, our office would be able to concur with a finding of **No Historic Properties Affected** for the proposed undertaking activities at the current facility once that determination has been provided

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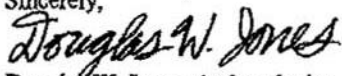
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to our office. We will look forward to consulting with the various agencies that may be involved in the proposed future corollary activities.

Please reference the Review and Compliance Number provided above in all future submitted correspondence to our office for this project. We look forward to further consulting with you as part of the Section 106 consultation process for this project. Should you have any questions please contact me at the number below.

Sincerely,



Douglas W. Jones, Archaeologist
Community Programs Bureau
(515) 281-4358

cc: Lowell Soike, Iowa Deputy State Historic Preservation Officer
Beth Pauls, Iowa State Archaeologist, Office of the State Archaeologist

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